

**UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF VIRGINIA
Alexandria Division**

LISA MCKEW, et al.,)	
)	
)	
<i>Plaintiffs,</i>)	
)	
v.)	Case No.: 1:11-cv-304-CMH
)	
)	
<i>Defendant.</i>)	
)	

**JOINT NOTICE OF MOTION AND MOTION FOR APPROVAL OF SETTLEMENT
OF FAIR LABOR STANDARDS COLLECTIVE ACTION**

PLEASE TAKE NOTICE that Named Plaintiffs Lisa McKew, Nancy Gruff, Toby Moldave, and Elizabeth Frankel, individually and on behalf of all Opt-In Plaintiffs (collectively, “Plaintiffs”) and Defendant VSM Sewing, Inc. (“Defendant”), by and through their counsel of record, will jointly move this Court for approval of their settlement of Plaintiffs’ claims brought under the Fair Labor Standards Act of 1938 (“FLSA”), 29 U.S.C. § 201, *et seq.* Because the parties believe that they have reached a fair and reasonable settlement and because all four (4) Named Plaintiffs have approved and accepted the terms of the settlement, the Parties request a fairness hearing for the Court to consider approving the Settlement in this matter.

MOTION

The Parties, by and through their counsel of record, jointly move this Court for an Order granting approval of their settlement of Plaintiffs’ claims brought under the Fair Labor Standards Act of 1938 (“FLSA”), 29 U.S.C. § 201, *et seq.* The parties are simultaneously submitting to the Court the Settlement Agreement and Release of Claims for *in camera* review and approval.

This FLSA collective action settlement (“Settlement”) is a product of an arm’s-length negotiation between the Parties. The Parties respectfully submit that (1) the Settlement resolves a bona fide dispute over FLSA provisions and (2) its terms are fair and reasonable. For these reasons, the Court should grant the joint motion, hold a fairness hearing and approve the Settlement.

Respectfully submitted,

/s/ Nicholas Woodfield
R. Scott Oswald, Esq.
VSB# 41770
Nicholas Woodfield, Esq.
VSB# 48938
The Employment Law Group, P.C.
888 17th Street, NW, Suite 900
Washington, D.C. 20006
(202) 261-2812
(202) 261-2835 (facsimile)
soswald@employmentlawgroup.com
nwoodfield@employmentlawgroup.com
Counsel for the Plaintiff

/s/ Virginia E. Robinson
John Scalia, Esq.
VSB# 46444
Virginia E. Robinson, Esq.
VSB# 71411
GREENBERG TRAURIG, LLP
1750 Tysons Blvd., Suite 1200
McLean, Virginia 22102
(703) 749-1300
(703) 749-1301 (facsimile)
robinsonv@gtlaw.com
scaliaj@gtlaw.com
Attorneys for Defendant VSM Sewing, Inc.

CERTIFICATE OF SERVICE

I hereby certify that on November 30, 2011, a copy of the foregoing was filed electronically with the Clerk of the Court using the CM/ECF system, which will send notification of such filing to the following:

John Scalia, Esq.
Virginia E. Robinson, Esq.
GREENBERG TRAURIG, LLP
1750 Tysons Blvd., Suite 1200
McLean, Virginia 22102
Telephone: (703) 749-1300
Facsimile: (703) 749-1301
robinsonv@gtlaw.com
scalij@gtlaw.com
Attorneys for Defendant VSM Sewing, Inc.

/s/ Nicholas Woodfield
R. Scott Oswald, Esq.
VSB# 41770
Nicholas Woodfield, Esq.
VSB# 48938
The Employment Law Group, P.C.
888 17th Street, NW, Suite 900
Washington, D.C. 20006
(202) 261-2812
(202) 261-2835 (facsimile)
soswald@employmentlawgroup.com
nwoodfield@employmentlawgroup.com
Counsel for the Plaintiff